

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: DEBRA HICKS  
Debtor

CHAPTER 13  
CASE NO: 20-51188 KMS

**TRUSTEE'S NOTICE AND MOTION TO MODIFY PLAN**

COMES NOW Chapter 13 Standing Trustee, David Rawlings, duly appointed to administer the above-referenced case, and moves to modify the confirmed Chapter 13 Plan for the reasons stated below:

1. The Debtor's Chapter 13 Case was filed on July 28, 2020, and the Plan confirmed by Order of this Court on September 22, 2020, for a term of 60 months.
2. That the Trustee either has funds on hand, and/or will receive plan payments which will enable a greater distribution to unsecured creditors than currently proposed under the confirmed plan.
3. The plan should, therefore, be modified to increase the distribution to unsecured creditors on a pro rata basis, percentage to be determined by the Trustee.
4. That only timely filed allowed claims will be entitled to receive distributions. Creditors which have not filed timely claims will not receive any distributions.
5. This modification does not change the plan length or the proposed monthly payment to the Trustee. Any existing wage order will, therefore, not be altered.
6. Further, secured, priority, and administrative claims will not be affected or impaired by this Motion.
7. You are hereby notified that all Objections to this modification must be made in writing to the Clerk of this Court. Attorneys and registered users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at the

U.S. Bankruptcy Court, U.S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.

8. You are further notified that all Objections must be made within thirty (30) days from the date of this filing, deadline being **June 27, 2025**.
9. You are further notified that should no objection be timely filed the Court will be requested to enter an Order ex parte.
10. Other grounds to be shown at a hearing, if necessary.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion to Modify, and for such other further relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: **May 28, 2025**.

Respectfully submitted,

/s/ David Rawlings

DAVID RAWLINGS

CHAPTER 13 TRUSTEE

P.O. BOX 566

HATTIESBURG, MS 39403

PHONE (601) 582-5011

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**CERTIFICATE**

I, David Rawlings, Chapter 13 Trustee, do hereby certify that I have on this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification; Office of the U.S. Trustee, 501 East Court Street, Suite 6-430, Jackson, MS 39201; Thomas Carl Rollins, Jr., The Rollins Law Firm, PLLC, P.O. Box 13767, Jackson, MS 39236.

Dated: May 28, 2025

/s/David Rawlings

David Rawlings

Chapter 13 Trustee